

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

MATTHEW TOBIN

on behalf of himself and all
others similarly situated,

Plaintiffs,

v.

BEER CAPITOL DISTRIBUTING,
INC., et al.

Defendants.

CASE NO. 12-CV-0274

HON. CHARLES N.
CLEVERT, JR.

JOINT MOTION FOR
FINAL APPROVAL OF
CLASS AND COLLECTIVE
ACTION SETTLEMENT

Pursuant to the Settlement Agreement entered into by the Parties (Dkt. 33-1) and preliminary approved by this Court (Dkt. 35), Section 16(b) of the Fair Labor Standards Act (29 U.S.C. §216(b)), the Wisconsin Wage Payment and Collection Laws (Wis. Stat. § 109.01, et. seq.; Wis. Stat. § 104.001, et. seq.; Wis. Admin. Code §§ 272 and § 274), FED. R. CIV. P. 54(d) and 28 U.S.C. § 1920, the parties respectfully move the Court for a Final Order approving the settlement and including the following:

- 1) Finally approving the Settlement Agreement, adjudging its terms to be fair, reasonable, and adequate, and entering an order directing consummation of its terms and provisions by the parties;
- 2) Finally approving the Enhancement Payment to the Class Representative;
- 3) Approving Class Counsel's motion for costs and attorneys' fees, and awarding Class Counsel's attorneys' fees and costs;
- 4) Finally approving the settlement payments to be paid to the participating Settlement Class Members pursuant to the allocation

formulas set forth in Exhibit A to the Settlement Agreement
(Dkt. 33-1);

5) Dismissing this Lawsuit on the merits and with prejudice.

Respectfully submitted this 25th day of January, 2013.

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